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United States Environmental Protection Agency
Office of Air and Radiation
Washington DC, 20460

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Ms. Daken,

Northeast Energy Efficiency Partnerships (NEEP) appreciates the opportunity to provide comments to ENERGY STAR's Connected Thermostats V1.0 Specification Method to Demonstrate Connected Thermostat Field Savings draft 2. After a careful review of the draft documents, as well as participation in the EPA led webinar on October 13th, NEEP respectfully submits this letter. NEEP is generally very supportive of the direction of the specification. We have a few small recommendations and requests to help improve robustness as outlined below:

Data Auditing:

NEEP recognizes the unique challenge of this specification, as the regular submission of field data is a more complex process than many ENERGY STAR products must take to qualify. That being said, NEEP encourages EPA to reserve the right to audit the data starting from the very first submissions. While it is likely that some handholding will be necessary to ensure the data is in the proper form, and it will be a learning curve on both sides, EPA should still have the right to audit data at any time, even if the anticipation is that a full auditing program would not begin immediately. There are opportunities for program administrators across the country to aide with this process, and NEEP encourages EPA to leave the auditing door open from the get-go.

Data points:

NEEP understands the goal of at least 100 output homes to be analyzed for each climate zone, but recognizes the opportunity to improve that requirement. As was discussed on the 10/13, requiring 100 data points output is nearly impossible, because the ratio of input homes to output homes is not exact. Given the mention on the 10/13 call that as many as 50% of the input number of homes might be lost when going to output, and also given the significant discrepancy in size of connected thermostat vendors, NEEP proposes the following input numbers per climate zone:

- Minimum input level is 150 (to hopefully end up with approx. 100 at the output but not over burden small vendors)
- From there, manufacturers should input 5% of their homes in each climate zone, up to 1000 input points.

As such, manufacturers with between 3,000 and 20,000 installations within a climate zone will scale up the level of data they provide, but those over 20,000 installations will not need to submit unnecessarily large amounts of data. We encourage EPA to consider an approach like this to increase the amount of data coming in to hopefully give a more representative sample of homes. One consideration in this case is that there can be differences across a climate zone that might need representation in a sample. For example, if an extreme weather event



impacts a small area of the climate zone, with fewer data points, it's possible no homes impacted by that event would be included in the analysis. More homes should mean a better representation across the climate zone and thus a more accurate understanding of the savings potential of the devices.

Process for Data Submission:

Finally, while it is not explicitly mentioned in this document, NEEP would like to suggest a streamlined process for submission of the data that was run through the metric tool. NEEP recommends that after the data is inputted into the tool, once the output is complete, that information is sent directly to EPA. This would minimize the opportunities for vendors to submit data, see that it doesn't meet ENERGY STAR's levels, and resubmit data to hope those homes will meet the criteria. This will keep the process more transparent and ultimately ensure that only manufacturers who are demonstrating reliable savings earn ENERGY STAR Recognition.

Thank you again for offering this opportunity for NEEP to provide comments on this second draft of the Connected Thermostat Specification Savings Method. Please don't hesitate to contact me with any follow up questions or clarifications.

Sincerely,

A handwritten signature in black ink, appearing to read 'Claire Miziolek', with a stylized flourish at the end.

Claire Miziolek
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